

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

TINA LINDQUIST,

Plaintiff,

vs.

HEIM, L.P.,

Defendant.

Civil Action No: 04-249E

JUDGE SEAN J. MCLAUGHLIN

PAUL R. ROBINSON, ESQUIRE
PA I.D. No. 65581
MEYER, DARRAGH, BUCKLER,
BEBENEK & ECK, P.L.L.C.
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HEIM, L.P.'S JURY VOIR DIRE

AND NOW, comes the defendant, HEIM, L.P. (hereinafter "Heim"), through its attorneys, MEYER, DARRAGH, BUCKLER, BEBENEK & ECK, P.L.L.C., filing its jury voir dire, as follows:

1. Have any of you been injured at your place of employment and, if so, please describe the circumstances.
2. Have any of you asserted a workers' compensation claim against your employer and, if so, please describe the circumstances.

3. Have any of you been injured as a result of your employer's conduct or work rules and, if so, describe the circumstances.

4. Have any of you ever operated a power press, press brake, or punch press and, if so, describe the circumstances including the manufacturer of the product, type of product, use of the product, and the type of point-of-operation safety device which was utilized if any.

5. Do any of you believe that a manufacturer of a product should be any liable for any harm caused by that product, regardless of fault?

6. Do any of you have any knowledge of the OSHA requirements placed upon an employer who utilizes a power press or press brake in its operations and, if so, describe that knowledge and its source.

7. Do any of you feel that you will be unable to fairly evaluate whether or not Heim is liable for the plaintiff's injuries due to the seriousness of those injuries and the affect that those serious injuries will have upon you?

8. Do any of you believe that someone who is as seriously injured as the plaintiff should be awarded monetary damages solely because such serious injuries were sustained?

9. Do any of you have any knowledge concerning the usefulness of power presses and press brakes in the metal-forming industry and, if so, please describe that knowledge and its source.

Respectfully submitted,

MEYER, DARRAGH, BUCKLER,
BEBENEK & ECK, P.L.L.C.

By: /s/ Paul. R. Robinson

PAUL R. ROBINSON, ESQUIRE
Attorney for Heim, L.P.
PA I.D. No. 65581

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PROOF OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served upon all parties on the date and in the manner listed below:

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<u> X </u>	Electronic Transmission

at the following address:

Dallas W. Hartman, Esquire
Dallas W. Hartman P.C.
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(Counsel for Plaintiff)

MEYER, DARRAGH, BUCKLER,
BEBENEK & ECK, P.L.L.C.

Date: August 10, 2007

/s/ Paul R. Robinson
PAUL R. ROBINSON, ESQUIRE